



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

US EPA RECORDS CENTER REGION 5



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REPLY TO THE ATTENTION OF: SR-6J

August 29, 2011

Thomas W. Steib
Operations Manager
Detrex Chemicals Division
Elco Corporation
1100 N. State Road
Ashtabula, OH 44004

Re: Transmittal of Review Comments
Additional Excavation of DS Tributary Work Plan Addendum
Detrex Source Control Area – Fields Brook Superfund Site
URS Corp., August 19, 2011

Dear Mr Steib:

EPA has completed its review of the above referenced document. Our comments are attached. Please provide responses to the comments along with the corresponding Work Plan revisions.

I can be reached by phone at 312 886-4843 if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Owen Thompson".

W. Owen Thompson
Remedial Project Manager
Superfund Division

Attachment

cc: Peter Felitti, U.S. EPA C-14J
William Earle, SulTRAC
Robert Currie, Detrex
Martin Schmidt, URS
Regan Williams, Ohio EPA

U.S. Environmental Protection Agency Region 5

TECHNICAL REVIEW COMMENTS ON “ADDITIONAL EXCAVATION OF DS TRIBUTARY WORK PLAN ADDENDUM, DETREX SOURCE CONTROL AREA - FIELDS BROOK SUPERFUND SITE” FIELDS BROOK SUPERFUND SITE, ASHTABULA, OHIO URS Corp., August 19, 2011

EPA Comments Prepared August 29, 2011

GENERAL COMMENTS

1. EPA should be informed of the field work schedule at least one and preferably two weeks before field work is to begin so that EPA, EPA's contractor, and/or the Ohio Environmental Protection Agency (Ohio EPA) can provide oversight.
2. If surface water is present, consideration should be given to collecting surface water samples from the same locations as the sediment samples. Surface water samples should be analyzed for the same parameters as the sediment samples (volatile and semivolatile organic compounds), and field notes should clearly indicate if nonaqueous-phase liquid (NAPL) is present in each water sample. This information will allow better evaluation of the results that the Fields Brook Action Group (FBAG) presented in its July 2011 meeting with EPA. (Detrex was not present at this meeting).
3. In its July 2011 presentation, FBAG identified two “new” areas requiring investigation: (1) the “Detrex Ditch” parallel to the north Detrex property line but south of both the DS Tributary and the rail spur and (2) a 12- to 14-inch-diameter sewer line that discharged to the DS Tributary at a point in the culvert under State Road and the rail spur. In addition to the work proposed for the DS Tributary east of State Road, a similar investigation should be performed for the “Detrex Ditch” identified by FBAG in its July presentation and in Figure 1 of the work plan addendum. Detrex and URS also should be prepared to collect additional “samples of opportunity” of soil, sediment, water, or NAPL identified during the investigation. The location(s) of these sample(s) should be determined in the field by Detrex, URS, EPA, and EPA's contractor in consultation.

SPECIFIC COMMENTS

1. Page 2, Scope of Work for Additional Investigations, Bullet 1: In addition to the work outlined in this bulleted item, a similar investigation should be performed for the “Detrex Ditch” identified by FBAG in its July presentation and in Figure 1 of the work plan addendum if the ditch's location and presence can be verified.

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2. Page 3, Paragraph 3: Depending on results of the closed-circuit television (CCTV) investigation, additional investigation should be conducted for (1) the “14-inch line” identified by FBAG in its July 2011 presentation and shown in Figure 1 of the work plan addendum and (2)

other features identified during the CCTV investigation. The investigation should be conducted to investigate the origin of the "14-inch line" if the CCTV inspection fails to identify its origin.

3. Page 3, Paragraphs 4 and 5: If signs of contamination are found during the field reconnaissance, the sediment augering program proposed for 75-foot intervals should be modified to include these other locations. Visual reconnaissance and field screening sampling should be conducted at these locations even if they do not fall at the 75-foot intervals. Additionally, if the "Detrex Ditch" can be identified, it should undergo an investigation and sampling similar to that proposed for the DS Tributary east of State Road.